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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
2005 OCT 24 A 4:31
NORTHERN DIVISION

CHARLES ANTHONY KEGLER,
AIS # 127802 Plaintiff,

VS.

CIVIL ACTION NO:
2:05-CV-619-F (WO)

WARDEN G. MOSLEY, et al.,
Defendant's,

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, Plaintiff, CHARLES ANTHONY KEGLER, proceeding Pro-Se, in the above styled Cause, and respectfully files this, the Plaintiff's First Request for Production of Document's unto the Defendant's.

Plaintiff files this Request for PRODUCTION OF DOCUMENTS pursuant to RULE 34 F.R.CIV.P, and states the following in support: The Defendant's shall serve a written response within 30 Days after receipt of said Request. The response shall state with respect to each item or request, if something is Objected too, then you should state the reason for that Objection. If you do not have possession of said Document, please provide the name and address(es) of the person(s) having said Document.

1. Please provide a Certified Copy of the last Inspection Report from either ADEM or from the EPA (ALABAMA or NATIONAL HEADQUARTERS) stating that they have taken and tested the Water that is served and or is used within the confines of EASTERLING CORRECTIONAL FACILITY.

2. Please provide a Copy of the Testing Results for the Previous Five (5) Years, from ADEM for the Water used at the EASTERLING CORRECTIONAL FACILITY.
3. Please provide a Certified Copy of the Permit for the Water Tank (Tower) that is located on the A.D.O.C. EASTERLING CORRECTIONAL FACILITY PROPERTY, LOCATED APPROXIMATELY 200-300 FEET FROM THE PRISON FENCES, AND WITHIN DIRECT SIGHT OF THE PRISON.
4. Please show a listing of the Billing for Water Used for and Billed for, for EASTERLING CORRECTIONAL FACILITY for the previous Five (5) Years, and up to date.
5. Please provide a copy of any and all Medical Complaints, where Inmates have complained of the Water, or complained of Rashes, etc., stemming from the Water that they are forced to use.
6. Please provide a copy of any Complaints in General, to Defendant Mosley, or any other Correctional Supervisor or Officer or even Maintenance Supervisor, concerning the Water used at EASTERLING CORRECTIONAL FACILITY.
7. Please provide a copy of whatever Documents showing the Water Tanks' (Tower) Water Level, (WHICH IS LOCATED ON A.D.O.C. EASTERLING CORRECTIONAL FACILITY PROPERTY, for the previous Five (5) years and up to date.
8. Please provide of a copy of any maintenance work that has been done on any of the Water Pipes, by either The EASTERLING CORRECTIONAL FACILITY Maintenance Supervisors, and or City of Clio ADEM Staff. This is for the Water Pipes, located on EASTERLING CORRECTIONAL FACILITY, A.D.O.C. Property, for the previous Five (5) years and up to date.

9. Please provide a Document that shows, that the Water Tower (Tank) which is located on Easterling Correctional Facility Property, is not providing the Water that is currently used by the Prisoners who are Housed at Easterling Correctional Facility?

DATED: OCTOBER 20, 2005.

Respectfully Submitted,

Charles Anthony Kegler
CHARLES ANTHONY KEGLER
AIS # 127802 DORM 6B-
108
EASTERLING CORRECTIONAL FAC.
200 WALLACE DRIVE
CLIO, ALABAMA 36017

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon Counsel for the Defendant's and the Clerk of the Court by placing said Copy in the Institutional Mailbox located on EASTERLING CORRECTIONAL FACILITY PROPERTY, with First Class Postage Affixed and properly addressed as follows: MR. TROY KING, ATTORNEY GENERAL, and MR. JEFFERY H. LONG, ASSISTANT ATTORNEY GENERAL, OFFICE OF THE ATTORNEY GENERAL, ALABAMA STATE HOUSE, 11 SOUTH UNION STREET, MONTGOMERY, ALABAMA 36130 on this the 20th day of October, 2005.

Charles Anthony Kegler
CHARLES ANTHONY KEGLER